

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”) an individual,  
Kenneth Petty, AKA (“Zoo”), an individual

Defendants.

Civil Action No. 21-cv-4568

Declaration of Tyrone A. Blackburn

**Declaration of Tyrone A. Blackburn**

I, Tyrone A. Blackburn, hereby declare according to 28 U.S.C. §1746 as follows:

1. I am an attorney duly admitted to practice in the State of New York. I am counsel for Plaintiff Jennifer Hough (“Ms. Hough”) in the above matter.
2. I have personal knowledge of the facts set forth in this Declaration.
3. I submit this Declaration in opposition to former Defendant Maraj and Counsel Judd Burstein’s ridiculous Motion for Sanctions pursuant to 28 U.S.C. § 1927 and the Court’s Inherent Power against Plaintiff Jennifer Hough’s counsel Tyrone Blackburn.

**Former Plaintiff’s Counsel Steven Gordon:**

4. I received a firsthand account from Gordon’s family concerning Gordon’s purported drug addiction.
5. I received a firsthand account of the kind of drugs Gordon is addicted<sup>1</sup> too, as well as graphically detailed accounts of the impact Gordon’s addiction has had on Gordon’s

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<sup>1</sup> Respecting the wishes of Mrs. Gordon, for the purposes of this declaration I will refrain from detailing the specific substances and drugs that Mr. Gordon is addicted too.

family.

6. I did not know that Gordon had a drug addiction at the time he joined this case as co-counsel in October 2021.
7. If I had known of Gordon's drug addiction at the time he asked me to join this case as co-counsel I would have **NEVER** allowed him onto this case.
8. Partnering with Steven Gordon is by far the biggest regret I have in my career.
9. Upon information and belief, Gordon's purported drug addiction may have impacted his actions and the decisions he made as co-counsel to Plaintiff Hough.

Gordon's Erratic Behavior:

10. Aside from Gordon's purported drug addiction, on January 26, 2022, I learned through conversations with Plaintiff Hough that Gordon was engaging in erratic behavior.
11. Gordon called Plaintiff Hough incessantly, Monday through Sunday, crying and complaining about the harassing messages he was receiving from Maraj's fans.
12. Gordon's calls were not limited to complaints concerning his hurt feelings; Gordon also disclosed unsolicited graphic details of his acts of adultery.
13. Gordon's incessant calls were even more problematic because Gordon was aware of the vulnerable mental and emotional state Plaintiff Hough is in because of the actions of Defendant Petty and Maraj.
14. The sheer weakness Gordon displayed caused Plaintiff Hough to forgo her own healing process and assume the role of a mother figure or caretaker to pacify Gordon and provide him with the self-confidence he so desperately lacks.
15. Plaintiff Hough missed a few therapy sessions due to the guilt she felt as a result of Gordon's weakness.

16. When confronted about his erratic behavior, Gordon confirmed Plaintiff Hough's concerns when he attempted to shift the blame of his infidelity to his estranged wife.

Gordon Failed to Disclose Offers and Communications From Burstein to Plaintiff Hough and Mr. Blackburn:

17. According to Burstein's January 26, 2022, proposed sanction motion, Burstein and Mr. Gordon had several secretive conversations where Burstein provided Gordon with offers never disclosed to Mr. Blackburn or Plaintiff. **(Exhibit A)**.

In the January 26, 2022, proposed sanction motion, Burstein writes in relevant part:

"Mr. Burstein privately implores Mr. Gordon to convince Mr. Blackburn to abandon the effort to secure a Default Judgment against Ms. Maraj and offers not to seek any sanctions if they do so." **(Exhibit A)**.

18. This offer was not presented to Plaintiff Hough or to me.

Gordon Impersonated Mrs. Gordon In YouTube Comments:

19. After Plaintiff terminated him, Gordon admitted to drafting the YouTube comment allegedly written by Mrs. Gordon.
20. Gordon also revealed that he posted the comment himself under Mrs. Gordon's name.
21. Shortly after impersonating his wife and creating this YouTube post, Burstein sent the "Your Wife" email to Mr. Blackburn, Gordon, Mr. Isser, and several Burstein's law practice members. **(Exhibit B)**.
22. Gordon called me and requested my assistance in getting Burstein to cease sending group emails concerning Gordon's wife.
23. Burstein did not reveal how he allegedly learned of the YouTube comment until January 26, 2022, in his proposed sanction motion. **(Exhibit A)**.

Gordon Refused To Provide Plaintiff With All Email And Text Communications With Burstein:

24. In forgoing his duty to disclose all matters to Plaintiff Hough, Gordon has refused and continues to refuse to turn over the full detail of all communications he had with Burstein throughout his involvement in this case.

25. Plaintiff Hough and I were unaware that Gordon had ongoing secret conversations with Burstein.

26. Upon information and belief, Gordon selflessly secured a deal with Burstein in exchange for an email dated January 28, 2022, where he states:

“ Dear Judd:

As we have discussed:

Tyrone Blackburn sent a letter to the Court on January 22, 2022, in which he stated:

"An example of [Mr. Burstein's] deplorable behavior stems from his sick obsession with Mr. Gordon's wife. Mr. Burstein went scrummaging through the comments section of youtube posts in search of comments posted by Mrs. Gordon. Not only was his act of cyberstalking Mrs. Gordon creepy, but it was also weird, and beneath the dignity of this profession."

I write to confirm the following:

1. I did not see Mr. Blackburn's letter before he sent it;
2. I would have objected to these comments if I had seen the letter before it was sent (although I had no control over anything which Mr. Blackburn ultimately filed with the Court);
3. I do not in any way agree with them; and
4. I never at any time said anything to Mr. Blackburn even to suggest that I agreed with the views as expressed in his letter;

As we have also discussed, I was not lead counsel in the case against Ms. Maraj, and I had no control over statements of facts ultimately submitted in Mr. Blackburn's filings.

I appreciate the fact that you and your client have accepted my explanations as set forth above and have acknowledged that, in my role as Mr. Blackburn's co-counsel, I never acted in bad faith and that I had a good faith belief in the truth of Ms. Hough's factual allegations.” (**Exhibit C**).

27. Gordon did not provide a sworn declaration with this self-serving bag of lies email.

28. Furthermore, Gordon failed to detail that he asked me to write the letter in question in order to defend him and his wife.

29. Gordon also failed to mention that he orchestrated the YouTube post and manufactured his fear and outrage over Burstein's "Your Wife" email.

Former Defendant Maraj:

30. Upon information and belief, on March 4, 2020, Defendant Petty was arrested and charged with failing to register as a sex offender in California.

31. Upon information and belief, on March 8, 2020, Barry Dukes ("Dukes"), a friend of both Petty and Maraj, reached out to Plaintiff on social media after not speaking with Plaintiff for over 25 years.

32. Upon information and belief, between March 4, 2020, and March 9, 2020, Defendant Petty provided Duke with Maraj's phone number so Duke could connect Maraj and Plaintiff on the phone. (**Exhibit D, ¶ 29**).

33. On March 9, 2020, Maraj contacted Plaintiff and encouraged her to recant her 1994 rape claim against Petty.

34. In her December 30, 2021 Declaration, Maraj provided a clear motive for conspiring with Dukes and Petty to get Plaintiff to recant her 1994 rape claim when she said,

“A few days after the arrest, Barry, an old acquaintance from the Queens neighborhood in which we grew up, and known to all of us as “Black,” reached out to me to say that Plaintiff wanted to speak to me about what happened in 1994. I did not call Plaintiff. Rather, as I recall what happened, Black connected Plaintiff and me through his phone. As any wife would do in that situation, I told her that I had been informed that she wanted to speak with me about taking back her accusation.” (**Exhibit E, ¶ 16**).

35. Upon information and belief, Maraj has a reputation of supporting sex offenders.

36. In November 2017, Maraj's brother, Jelani Maraj, was convicted of endangering the welfare of a child and predatory sexual assault on a child younger than 13<sup>2</sup>.
37. Upon information and belief, Jelani consistently raped his 11-year-old stepdaughter until she was 15-years old.
38. Jelani is now serving 25 years to Life in New York State prison.
39. Upon information and belief, Maraj paid for Jelani's attorneys and orchestrated a public relations campaign attempting to discredit the 11-year-old female victim.
40. Upon information and belief, Carol Maraj, Maraj's mother, went online to paint the 11-year-old victim as promiscuous.
41. On August 6, 2021, after Plaintiff rejected Maraj, Petty, and Duke's coercion to recant her 1994 rape claim against Petty, two-time convicted felon Petty accepted a plea deal for failing to register as a sex offender.
42. Upon information and belief, on or about August 12, 2021, Dukes published a video on his Instagram page threatening Plaintiff's life. The video went on to say:
- "Jon Wayne tv coming soon tell that bitch she will be exposed case over now 20k, huh,"  
"u know u don't fucked uped,"  
"Jon wayne tv,"  
"you lying ass bitch, 20 thousand,"
43. Dukes ends the montage with a photo of two guns circled, with the words "be safe out here lol" written on the photo. (**Exhibit F**).
44. Upon information and belief, Maraj never denounced Dukes' death threat.
45. A few weeks later, a member of the Makk Balla Brim's ("MBB") blood gang threatened to harm Plaintiff on social media when they posted the following:

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<sup>2</sup> <https://www.nbcnewyork.com/news/local/crime-and-courts/da-nicki-minajs-brother-sentenced-to-25-to-life-for-raping-11-year-old-girl/2268937/>

“Jennifer if you see this, the Makks are coming to get you.” (**Exhibit G**).

46. Before filing suit, Plaintiff ensured the Court's jurisdiction over Maraj through her ownership of a residence in this district located at 967 Middle Bay Dr. Baldwin, NY 11510.

47. Upon information and belief, the following business is owned by Maraj and is listed as having an address in the state of New York: Pink Friday Films, Inc: Corporation # 4404714.

48. As part of her opposition to Plaintiff's motion for default judgment, Maraj clarified her ownership of the property located at 967 Middle Bay Dr. Baldwin, NY 11510. (**Exhibit E, ¶ 34, Footnote 5**).

49. According to Maraj, the property is her mother's residence, and Maraj is the “Grantor, but not the trustee, of a trust which owns a house on Long Island in which my mother lives.” (**Exhibit E, ¶ 34, Footnote 5**).

50. Shortly after learning this new information, Plaintiff withdrew her claims against Maraj in New York and has decided to refile against Maraj in a district where this case might have been brought, California. (**Docket # 46**).

51. This decision by Plaintiff Hough to withdraw the action against Maraj in New York and refile in California was **not** made in bad faith.

Maraj's Role In Petty's Default and Her Purported Gang Affiliation:

52. Maraj played an important role in Petty's default, as he stated in his Declaration dated November 5, 2021. According to Petty,

“After learning about the Amended Complaint, I diligently sought to obtain counsel and spoke with a number of lawyers about representing me in this action (my New York lawyer does not do this type of civil litigation). Because, however I am married to a wealthy celebrity, lawyers I spoke with asked for outrageous fees and sought exorbitant retainers (such as \$100,000). During this time, my wife, a co-defendant in this action, also was seeking to obtain counsel and was in the process of retaining Judd Burstein, Esq. to represent her in this action. Mr. Burstein had agreed to help me obtain counsel. Due, however, to a miscommunication between

Mr. Burstein and my wife, my wife and I both mistakenly believed that Mr. Burstein had been retained and was looking for counsel for me." (**Exhibit D**, ¶ 6).

53. Upon information and belief, neither Petty nor Maraj has rheumatoid arthritis. Therefore it is safe to assume the hand gestures they make in many photos are gang signs affiliated with the Makk Balla Brims Gang. (**Exhibit H**).

54. This conclusion is aided by the fact that two-time convicted felon Petty published a video on his Instagram account stating:

"Gang Shit, Gang Shit, Gang Shit, Heavy on the Makk, Heavy on the Makk ..." while making the same hand gesture Maraj is making in the attached photos in Exhibit H. (**See Exhibit I**).

55. Ms. Maraj's purported gang affiliation can be reasonably assumed from the rap lyrics of her song "Yikes," which states in relevant part:

"Woke up, the price of coke up (woo, woo)  
I just hit'em with the low cut, then call my folks up (Folks)  
Somebody 'bout to get poked up, go call a tow truck (Tow)  
All that talkin' out your neck  
Might Just get your throat cut (Ooh, ooh)  
This is a MAKK Truck, not a black truck (woo)  
When we move, tell'em, back up, click, click, clack, duck  
Hella bands, pull up, stashed up super facts up  
All you bitches Rosa Parks, uh-oh, get your ass up, uh". (**Exhibit J**).

56. Furthermore, when asked by one of her fartz<sup>3</sup> on Twitter, if two-time felon Petty enjoyed the song, Maraj stated, "of course you know he enjoyed the Makk Truck lyric," presumably referring to the lyrics from "Yikes" previously mentioned. (**Exhibit K**).

57. Maraj's assumed membership with the Makk Balla Brims is predicated on her actions!

58. Upon information and belief, before dating Petty in 2018, Maraj had never posted anything related to the Makk Balla Brims to her social media.

#### Judd Burstein Engages in Rambo Layering:

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<sup>3</sup> Upon information and belief, Fartz is the name of Ms. Maraj's delusional fan base.




59. On or about January 12, 2022, in an act beneath the dignity of this profession and in line with his reputation to engage in Rambo lawyering, Mr. Burstein sent an email attacking Mr. Blackburn and former Plaintiff's counsels as "bottom feeders." (**Exhibit L**)

60. In a desperate quest for media attention, presumably, to breathe life into his waning practice, Burstein intentionally leaked the January 12, 2022, email to TMZ. (**Exhibit M**).

I declare under penalty of perjury that the preceding is true and correct.

Executed on March 25, 2022

  
Tyrone A. Blackburn, Esq.